

EXHIBIT 8

UNITED STATES DISTRICT COURT
IN AND FOR THE DISTRICT OF WYOMING

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STEPHANIE WADSWORTH, :
Individually and as :
Parent and Legal :
Guardian of W.W., K.W., :
G.W. and L.W., minor : Case No.
children, and MATTHEW : 2:23-cv-00118-NDF JURY
WADSWORTH, :
Plaintiff, :
v. :
WALMART, INC. and JETSON :
ELECTRIC BIKES, LLC, :
Defendants. :

DEPOSITION OF MATTHEW WADSWORTH
TAKEN THROUGH
VERITEXT

Taken on Monday, February 26, 2024
9:57 a.m. to 2:47 p.m.

At HAMPTON INN
1055 Wild Horse Canyon Road
Green River, Wyoming 82935

Reported by: Abigail D.W. Johnson, RPR, CRR, CRC
Job No.: CS6457156

A P P E A R A N C E S

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February 26, 2024

9:57 a.m.

P R O C E E D I N G S

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Thereupon --

MATTHEW WADSWORTH,

was called as a witness, and having been first duly sworn to tell the truth, the whole truth, and nothing but the truth, testified as follows:

EXAMINATION

BY MR. LAFLAMME:

Q. Mr. Wadsworth, my name is Eugene LaFlamme, and I represent the defendants in this case. And you're aware that you are here today as a result of your inclusion or filing of a lawsuit against Jetson and Walmart; correct?

A. Correct.

Q. Okay. What is your full name, for the record?

A. Matthew James Wadsworth.

Q. And is "Matthew" two Ts?

A. Correct.

Q. M-a-t-t-h-e-w?

A. Correct.

Q. Okay. What's your date of birth?

A. 4/13/1987.

1 been diagnosed with ADHD?

2 A. Correct.

3 Q. Okay. And is getting some medication as a
4 result of that?

5 A. Correct.

6 Q. Did he have any ADHD issues prior to the
7 fire?

8 A. I believe so.

9 Q. Okay.

10 A. I don't know if it was diagnosed before the
11 fire.

12 Q. Okay. And K[REDACTED] is -- has some ADHD
13 treatment as well; is that correct?

14 A. Yes.

15 Q. Okay. K[REDACTED] was getting the treatment
16 prior to the fire --

17 A. Yes.

18 Q. -- for ADHD. And she's still under -- has
19 some treatment for ADHD --

20 A. Yes.

21 Q. -- ongoing?

22 All right. Is G[REDACTED] receiving any
23 treatment for anything currently?

24 A. No.

25 Q. All right. And how is W[REDACTED] doing?

1 A. In what manner?

2 Q. A fair clarification. That was a pretty
3 broad question. W█████ obviously had some physical
4 injuries in the fire; correct?

5 A. Correct.

6 Q. How is he -- do those physical injuries
7 give him any limitations presently?

8 A. Physically, no.

9 Q. Okay.

10 A. Mentally, yes.

11 Q. Okay. And then -- go ahead.

12 A. Let me clarify. Physically, yes, on the
13 fact that the sun hurts.

14 Q. Okay.

15 A. So outside, he has to remain covered.

16 Q. I assume the sun hurts the areas that he
17 had the burn injuries on?

18 A. Correct.

19 Q. Okay. And I understand the burn injuries
20 were to both his hands and his arms and then his shins;
21 is that accurate?

22 A. His knee, down his shin and then hands and
23 a place on his back.

24 Q. Okay.

25 A. Lower back.

1 Q. Does he have to wear gloves when he goes
2 outside for sun coverage?

3 A. For his hands, it's managed with sunscreen.

4 Q. Okay. And then -- so it sounds like for --
5 his knee is typically covered then?

6 A. Correct.

7 Q. And his back is covered?

8 A. Correct.

9 Q. Okay. As far as, understanding he's a
10 kindergartner, his ability to play at the school
11 playground and engage in those types of activities, it
12 sounds like he's able to do those, but needs to cover
13 up for some protection?

14 A. Correct. And they are -- the scars are
15 very sensitive.

16 Q. Okay. Sensitive to touch?

17 A. Correct. If a normal kid smacks his knee,
18 they will just keep running. He will drop down crying.

19 Q. Okay. And is he currently getting any
20 ongoing treatment for the burn injuries?

21 A. Yes.

22 Q. And what does that treatment include?

23 A. Laser. I don't know the technical term.

24 Q. Okay. And is that something that is
25 currently ongoing, or has that reached its course?

1 A. Currently.

2 Q. So, meaning, he has it recently and he will
3 have it in the future looking forward?

4 A. Yes.

5 Q. Do you have an understanding as to how long
6 he will need laser treatment?

7 A. I believe that he has one more treatment
8 and then they will do a scar assessment to see if it is
9 beneficial and to continue.

10 Q. Okay.

11 A. And they had told us that they will most
12 likely continue.

13 Q. Is this being done through the University
14 of Utah?

15 A. Correct.

16 Q. Who has been his primary doctor for the
17 burn injury treatment at University of Utah?

18 A. There's a primary team.

19 Q. Okay. Is there a lead on that team or --

20 A. No.

21 Q. Okay.

22 A. There are, I believe, three primary
23 doctors, and then there are multiple doctors underneath
24 them.

25 Q. Okay. Who are the three primary doctors?

REPORTER'S CERTIFICATE

STATE OF UTAH)

)

COUNTY OF SALT LAKE)

I, ABIGAIL D.W. JOHNSON, a Certified
Shorthand Reporter and Registered Professional
Reporter, hereby certify:

THAT the foregoing proceedings were
taken before me at the time and place therein set
forth, at which time the witness was placed under oath
to tell the truth, the whole truth, and nothing but the
truth; that the proceedings were taken down by me in
shorthand and thereafter my notes were transcribed
through computer-aided transcription; and the foregoing
transcript constitutes a full, true, and accurate
record of such testimony adduced and oral proceedings
had, and of the whole thereof.

I FURTHER CERTIFY that I am not a
relative or employee of any attorney of the parties,
nor do I have a financial interest in the action.

(X) Review and signature was requested.

() Review and signature was waived.

() Review and signature was not requested.

I have subscribed my name on this
11th day of March, 2024.



ABIGAIL D.W. JOHNSON, RPR, CRR, CRC